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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION  
13

14 UNITED STATES OF AMERICA,	)	CASE NO. 14-CR-00341-CRB
	)	
15 v.	)	MOTION FOR CONDITIONS PENDING APPEAL
	)	BY THE UNITED STATES AND [PROPOSED]
16 YURI SIDORENKO, ALEXANDER	)	ORDER
VASSILIEV, AND MAURICIO SICILIANO,	)	
	)	
17 Defendants.	)	
	)	
18	)	

19  
20 The United States has filed notice of appeal to the United States Court of Appeals for the Ninth  
21 Circuit pursuant to 18 U.S.C. § 3731 and 28 U.S.C. § 1291. The United States hereby requests that,  
22 pursuant to 18 U.S.C. 3143(c), all of the previous conditions of release as to defendant Mauricio  
23 Siciliano be reinstated pending the government's appeal, including the condition that he surrender his  
24 passport. The United States maintains, for all the reasons set forth during the defendant's detention  
25 hearing (Docket Nos. 12, 14, 28, 29), that defendant Siciliano is a risk of flight. For example, as the  
26 government argued during the detention hearing:

- 27 a. The defendant has an incentive to flee because he faces a term of imprisonment of up to  
28 65 years;

- b. The defendant has had frequent and regular foreign travel;
- c. The defendant lacks ties to the Northern District of California; he is a resident and citizen of Canada, as well as a citizen of Venezuela. The extradition process in Canada is often lengthy and any prospective waiver of extradition by the defendant would be unenforceable. Venezuela does not have an extradition treaty with the United States;
- a. The Government's evidence against the defendant is strong and includes the defendant's e-mail messages (some set forth in the Indictment) explicitly soliciting bribe payments and discussing favors he would do in return; the defendant's post-arrest statements admitting that he had indeed received bribes in connection with his work for ICAO.

Accordingly, pursuant to 18 U.S.C. 3143(c), the government respectfully submits that the conditions of release imposed by Judge Beeler following argument and briefing from the parties should be reinstated pending the government's appeal.

Dated: April 17, 2015

Respectfully submitted

MELINDA HAAG  
United States Attorney

By: /s/  
DAMALI A. TAYLOR  
Assistant United States Attorney

IT IS SO ORDERED.

Dated: April \_\_, 2015

HON. CHARLES R. BREYER  
United States District Judge